

AFFIDAVIT

I, Todd Winborn, being duly sworn, state under oath that:

1. I am a Detective with the Independence, Missouri Police Department (IPD), and am currently assigned to the Gun Squad under the IPDs Criminal Investigations Bureau. I am also a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been employed with IPD since 1998 and have been in investigations for 16 years with assignments in violent crimes and crimes against persons. In connection with my official duties, I have investigated numerous criminal violations of Titles 18 and 21 of the United States Code.

2. This Affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is based on my personal knowledge and observation during the course of this investigation, information conveyed to me by others, and my review of records, documents, and other physical evidence obtained during the investigation.

3. From my participation in this investigation, I believe the following facts to be true and accurate.

4. In the early morning hours of December 6, 2023, IPD officers were investigating an armed robbery of the Pizza Hut located at 9541 East Truman Road, Independence, Missouri. In that incident, the robbery suspect was wearing a black ski mask, black hat, and gray sweatshirt. After the robbery, the suspect fled on foot. An IPD officer and his canine, K9 Short, were deployed to assist in locating the suspect.

5. At approximately 2:15 a.m., IPD officers were following K9 Short's track when they came across a black Ford Fusion bearing Missouri license EJ1-D2P parked in front of 1102 South Crescent Avenue, Independence, Missouri. That location is within the Western District of

Missouri. The vehicle was idling without its lights on and there was one male occupant, later identified as SHANE C. HYDE.

6. Officers attempted to contact the driver, HYDE, who was wearing a black hat and gray sweatshirt, which matched the description given by the victim of the Pizza Hut robbery. When officers approached the Ford Fusion, HYDE fled in the vehicle. Officers initiated a vehicle chase and observed HYDE traveling at a high rate of speed without the vehicle's headlights illuminated. He also failed to yield and drove into opposing lanes of traffic at Truman Road and Menown Avenue. The chase was terminated because HYDE was driving in the wrong lane of traffic around a dangerous curve. Once he regained the proper lanes of traffic, the vehicle pursuit was re-initiated. Officers were able to successfully deploy "stop sticks," which helped end the pursuit. During the second portion of the pursuit, HYDE drove into oncoming traffic resulting in at least two vehicles having to take evasive action to avoid a collision.

7. Eventually, HYDE's vehicle became disabled due to the "stop sticks" and he struck a curb. After the car wrecked, HYDE exited the driver's seat holding a firearm in his left hand. Officers then pursued HYDE on foot. During the foot pursuit, officers observed something fall from HYDE's waistband. Officers were then able to successfully deploy their taser and take HYDE into custody after a brief struggle. Officers then located the item that fell to the ground during the foot pursuit and that was a Ruger AR-556 AR-style pistol with a collapsible rifle stock, bearing serial number 854-31225 on the lower. HYDE was placed under arrest for resisting arrest and being a felon in possession of a firearm.

8. An inventory prior to tow of HYDE's black Ford Fusion, revealed several rounds of various makes and calibers of ammunition, a firearm magazine, black and orange in color Halloween mask, a pair of Smith and Wesson handcuffs, a ballistic panel – level 2, two glass pipes

with residue that field tested positive for methamphetamine, and a plastic bag with approximately 0.33 grams of a substance that also field tested positive for methamphetamine.

9. A nexus expert with the ATF was contacted and determined the recovered firearm was not manufactured in the state of Missouri.

10. A criminal history check revealed HYDE has previously been convicted of offenses punishable by terms of imprisonment exceeding one year. Those convictions include:

- a. Possession of a Controlled Substance, in Jackson County, Missouri Circuit Court Case number 0716-CR02507-01, he pled guilty in 2012 and was placed on an SIS 3 probation. In June 2016, his SIS probation was revoked, and he was sentenced to four years in prison. The execution of his four-year sentence was suspended, and he was placed on a four-year term of probation.
- b. Possession of a Controlled Substance, in Jackson County, Missouri Circuit Court Case number 1616-CR04054-01, he pled guilty in 2017 and was sentenced to seventeen days in jail.
- c. Tampering with a Motor Vehicle in the First Degree, Resisting a Lawful Stop, and Property Damage in the First Degree, Jackson County, Missouri Circuit Court case number 1716-CR02575-01, he pled guilty in 2019 and was sentenced to three years in prison.
- d. Theft in Jackson County, Missouri Circuit Court, Case Number 1816-CR02546-01, he pled in 2019 and was sentenced to three years in prison.

11. HYDE also has a pending case for felon in possession of a firearm in Jackson County, Missouri Circuit Court case number 2116-CR01775. He also has a pending possession of a controlled substance charge in Jackson County, Missouri Circuit Court case number 2116-

CR03558. According to Missouri's case.net website, the defendant failed to appear on those cases on June 7, 2022 and currently has outstanding warrants for his arrest.

FURTHER AFFIANT SAYETH NAUGHT.



TODD WINBORN
Detective
Independence, Missouri Police Department

Subscribed and sworn to before me

this 6th day of December 2023. By telephone at 1:57 pm



HONORABLE W. BRIAN GADDY
United States Magistrate Judge
Western District of Missouri

